



June 26, 2015

Delivered by email to: julie.saare-edmonds@water.ca.gov

California Department of Water Resources
Urban Water Use Efficiency Unit
ATTN: Julie Saare-Edmonds, Senior Environmental Scientist
P.O. Box 942836
Sacramento, CA 94236-0001

Subject: "Comment Letter – Update to the State Model Water Efficient Landscape Ordinance

Dear Ms. Saare-Edmonds,

Santa Rosa Water appreciates the opportunity to comment on the Department of Water Resources (DWR) proposal to amend the State Model Water Efficient Landscape Ordinance (MWELO), which DWR released for public comment on June 12, 2015.

The City of Santa Rosa has a long-standing commitment to water conservation and improving outdoor water use efficiency. The City adopted our initial Water Efficient Landscape Policy in 1992 in response to the State of California Water Conservation in Landscaping Act (AB 325). Over the years our Water Efficient Landscape Policy was updated and in 2009, in response to the Water Conservation in Landscaping Act of 2006 (AB 1881) that required DWR to update the MWELO, the City convened a collaborative regional effort to draft our Water Efficient Landscape Ordinance (WELO). The stakeholder group was comprised of landscape contractors, landscape architects, planning officials, water conservation professionals, environmentalists and developers from throughout Sonoma, Marin, Napa and Mendocino counties. The result of this effort is our current Regional WELO that meets and exceeds the State's MWELO.

Upon review of the proposed amendments to the MWELO, Santa Rosa Water would like to suggest some changes as follows:

Section 492.6 (a)(3) – Soil Preparation, Mulch and Amendments.

Santa Rosa Water encourages soil preparation, mulch and amendments which assists with improving water use efficiency by improving the water holding capacity of the soil and limiting the loss of water due to evaporation. To provide consistency with storm water quality design

standards, please consider adding the following addition as subsection (H), additional language is underlined:

Section 492.6 (a)(3)(H) - “All soil treatments or amendments shall not result in floatable material which may reach or block the storm drain system.”

Section 492.6 (b)(10) – Landscape Design Plan.

Including the 24-hour regulation for retention and infiltration capacity conflicts with the requirements in the North Coast Region and may conflict with regulations in other jurisdictions. Additionally, if technical requirements are included in this document, additional information would be needed such as rainfall intensity and calculation method for the design storm to adequately design and size the storm water features. Please consider the following revisions, additional language is underlined and recommended language deletion is in strikeout:

Section 492.6 (b)(10) “identify location, installation details, and ~~24-hour~~ retention or infiltration capacity of any applicable stormwater best management practices that encourage on-site retention and infiltration of stormwater. Project applicants shall refer to the local agency or Regional Water Quality Control Board for information on any applicable stormwater technical requirements. Stormwater best management practices are encouraged in the landscape design plan and examples are provided in Section 492.16.”

Section 492.7 (a)(1)(A) – Irrigation Design Plan.

Requiring the addition of a dedicated irrigation meter or submeter for residential landscapes over 5,000 square feet can be problematic due to residential sites having limited space for all needed infrastructure. We suggest recommending this requirement for residential landscapes over 5,000 square feet. Please consider the following revision, additional language is underlined and recommended language deletion is in strikeout:

Section 492.7 (a)(1)(A) “Dedicated landscape water meters shall be required for all non-residential irrigated landscape of 1,000 sq ft but not more than 5,000 sq ft (the level at which Water Code 535 applies) ~~and residential irrigated landscapes of 5,000 sq ft or greater.~~ Dedicated landscape water meters are highly recommended for residential irrigated landscapes of 5,000 sq.ft or greater.”

Section 492.7(a)(1)(G) – Irrigation Design Plan.

Requiring flow sensors on existing irrigation systems has the potential to be very costly and difficult to install if there is no viable path from the point of connection to the irrigation controller. We suggest including this requirement for new development and recommending this requirement for rehabilitated landscapes. Please consider the following revision, additional language is underlined:

Section 492.7(a)(1)(G) “Flow sensors that detect high flow conditions created by system damage or malfunction are required for new construction projects and are recommended for rehabilitated landscape projects.

Section 492.7(a)(1)(H) – Irrigation Design Plan.

Requiring master valves on existing irrigation systems has the potential to be very costly and difficult to install since they are typically operated via the irrigation controller. We suggest including this requirement for new development and recommending this requirement for rehabilitated landscapes. Please consider the following revision, additional language is underlined and recommended language deletion is in strikeout:

Section 492.7(a)(1)(H) Master valves are required on all new construction projects and are recommended for rehabilitated landscape projects.

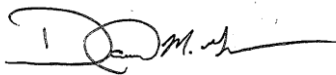
Section 492.16 (b) – Stormwater Management and Rainwater Retention.

The stormwater ordinance and stormwater management plans may not be the documents used to provide the technical guidance required. Please consider the following revision to clarify the intent, additional language is underlined and recommended language deletion is in strikeout:

Section 492.16 (b) “Project applicants shall refer to the local agency or Regional Water Quality Control Board for information on any applicable ~~stormwater ordinances and stormwater management plans~~ stormwater technical requirements.

Santa Rosa Water remains committed to improving the landscape water use efficiency of our community. Thank you for your consideration of these comments on the proposed amendments to the State Model Water Efficient Landscape Ordinance. Should you have any questions regarding these comments, please contact me at (707) 543-4299 or via email at dguhin@srcity.org.

Sincerely,



David M. Guhin
Director of Santa Rosa Water